

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

GEORGE MASON,

Plaintiff,

vs.

**AMERICAN INTERNATIONAL GROUP,
INC.; AMERICAN GENERAL
CORPORATION; AMERICAN GENERAL
FINANCE, INC.; CREDIT CENTERS, INC.,
d/b/a AMERICAN GENERAL FINANCE,
INC.; MERIT LIFE INSURANCE
COMPANY; YOSEMITE INSURANCE
COMPANY; KATHIE ROWELL; and
Fictitious Defendants "A", "B", and "C",
whether singular or plural, those other persons,
corporations, firms, or other entities whose
wrongful conduct caused the injuries and
damages to the Plaintiff, all of whose true and
correct names are unknown to Plaintiffs at this
time, but will be substituted by amendment
when ascertained,**

Defendants.

CIVIL ACTION NO.: CV-05-752

**NOTICE OF FILING AFFIDAVITS IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

COME NOW Defendants American International Group, Inc. and American General Corporation, and appearing specially to contest personal jurisdiction, hereby submit the Affidavits of Steven M. Dixon and Linda Sanchez in further support of their Motion to Dismiss due to this Court's lack of personal jurisdiction over Defendants American International Group, Inc. and American General Corporation.¹

Respectfully submitted,

¹ In filing this notice, American International Group and American General Corporation do not waive and specifically preserve their defense of failure to state a claim upon which relief can be granted, as well as other defenses pursuant to Rule 12 of the Federal Rules of Civil Procedure.

s/ John Thomas A. Malatesta
Jeffrey M. Grantham (ASB-4866-M66J)
Thomas J. Butler (ASB-7790-T75T)
John Thomas A. Malatesta, III (ASB-4646-O70M)
Attorneys for Defendants American International
Group, Inc. and American General Corporation

OF COUNSEL:

MAYNARD, COOPER & GALE, P.C.
2400 AmSouth/Harbert Plaza
1901 Sixth Avenue North
Birmingham, Alabama 35203-2618
205-254-1000
205-254-1999 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by U. S. Mail, postage prepaid, on this the 30th day of August, 2005:

C. Lance Gould, Esq.
BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.
272 Commerce Street
Montgomery, AL 36104

David Alan Elliott, Esq.
BURR & FORMAN LLP
SouthTrust Tower, Suite 3100
420 – 20th Street, North
Birmingham, AL 35203

s/ John Thomas A. Malatesta
OF COUNSEL